




APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 5/29/2024

May 28, 2024

VIA CM/ECF

Honorable Vernon S. Broderick
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, NY 10007

Re: *Dermansky v. The Hearst Corporation et. al*, No. 1:24-cv-01272-VSB

Dear Judge Broderick:

This firm represents Defendant Microsoft Corporation (“Microsoft”) in the above-referenced action. Pursuant to this Court’s Individual Rule of Practice 1.G, we write to respectfully request that the Court enter an order staying Microsoft’s deadline to answer or otherwise respond to the complaint until 14 days after the Court denies the pending Motion for a Stay Pending Arbitration or the case is returned to federal court.

Microsoft’s original deadline to answer or otherwise respond to the complaint was May 10, 2024. Microsoft has not made any previous requests for adjournments or extensions of time.

Through separate filings today, counsel for Microsoft has appeared in this matter and Microsoft has joined the pending Motion for a Stay Pending Arbitration. *See* Dkts. 39-41. While counsel for Plaintiff opposes the substance of the Motion for a Stay Pending Arbitration, they have represented they do not oppose Microsoft joining the pending motion. Plaintiff’s counsel has also represented that they do not believe an adjournment is necessary because Plaintiff considers the joinder in the motion to stay to be a response under Rule 12 and thus Microsoft will have 14 days from a decision on the motion to answer the complaint. Microsoft agrees and respectfully requests a confirming order from the Court. The adjournment of time is requested specifically because the Court’s ruling on the Motion for a Stay Pending Arbitration will dictate Microsoft’s response to the Complaint.

Thank you for the Court’s attention to this matter.

Respectfully submitted,


James Rosenfeld